

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DR. HANSEL M. DeBARTOLO)	
)	
Plaintiff,)	Case No. 07 C 7179
)	
v.)	JUDGE ZAGEL
)	MAGISTRATE JUDGE KEYS
SUBURBAN TEAMSTERS OF NORTHERN)	
ILLINOIS WELFARE FUND,)	
)	
Mutual Group.)	

**AGREED MOTION OF DEFENDANT
SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE FUND
TO ENLARGE TIME TO FILE ANSWER TO COMPLAINT OR OTHERWISE PLEAD**

Defendant SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE FUND , (hereinafter “Welfare Fund”), by and through its attorneys, Librado Arreola and Barry Collins of Asher, Gittler, Greenfield & D’Alba, Ltd., moves this Honorable Court to enlarge Defendant’s time to file its answer or otherwise plead. In support of this Motion, Plaintiff states:

1. Plaintiff filed his Complaint against Defendant on December 21, 2007. See Docket entry document number 1.
2. Defendant was sent a “Waiver of Service of Summons” on December 27, 2007. See Docket entry document number 6.
3. Defendant’s Answer to the Complaint or a Pleading must be filed by February 25, 2008. See Docket entry document number 6.
4. Counsel for Defendant contacted counsel for Plaintiffs, Lindsay M. Malitz, on February 25, 2008, requesting to know Plaintiff’s position regarding Defendant’s request to enlarge the time to answer or otherwise plead by 21 days. Plaintiff’s counsel agreed to

Defendant's extension.

5. This is Defendant's first request for an enlargement of the time to file its Answer or otherwise plead.

6. This request is not being made to delay these proceedings or to harass Plaintiffs.

7. Plaintiffs will not be prejudiced in any way by the granting of the additional time to Defendant to file its Answer or otherwise plead.

8. Defendant requests the additional time in order to thoroughly consider Plaintiff's claims and Defendant's defenses.

WHEREFORE, Defendant requests that this Honorable Court grant it an additional twenty-one (21) days (until March 17, 2008) to file its Answer or otherwise plead.

Respectfully submitted,

Defendant SUBURBAN TEAMSTERS OF
NORTHERN ILLINOIS WELFARE FUND,

/s/ Librado Arreola
Librado Arreola

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